

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

VICTIM RIGHTS LAW CENTER, *et al.*,

*Plaintiffs,*

v.

U.S. DEPARTMENT OF EDUCATION,  
*et al.*,

*Defendants.*

Case No. 1:25-cv-11042-MJJ

**STATUS REPORT REGARDING COMPLIANCE**

Defendants, through undersigned counsel, hereby file this Status Report documenting the steps they have taken to date to comply with this Court’s preliminary injunction. *See* ECF No. 40. That preliminary injunction, which was entered by the Court at 6:00 p.m. on Wednesday, June 18, required the filing of a status report “within 72 hours of the entry of this Order, describing all steps Defendants have taken to comply with this Order, and every week thereafter until the Department is restored to the status quo prior to January 20, 2025.” *Id.* at 43. Consistent with the Court’s order, Defendants submit this weekly status report. In support of the Status Report, Defendants submit the attached declaration, which identifies the steps the Department of Education has taken to date to comply with the Court’s preliminary injunction.

Dated: September 16, 2025

Respectfully submitted,

BRETT A. SHUMATE  
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ERIC J. HAMILTON  
Deputy Assistant Attorney General  
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/s/ Brad P. Rosenberg  
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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants.

Dated: September 16, 2025

/s/ Brad P. Rosenberg  
BRAD P. ROSENBERG  
Special Counsel